



October 12, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of Shakespeare Theatre Company, located in Washington, DC, that provides approximately 275 performances per year to 120,000 audience members and education programs to 13,000 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. Our mission is to create, preserve, and promote classic theatre –ambitious, enduring plays with universal themes- for all audiences. Having microphones and communication devices that are reliable and without interference directly impacts our ability to fulfill that mission.

We strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

Wireless devices play a large role in our day-to-day operations. On a regular basis, we use a variety of wireless microphones, in ear-monitors, assistive listening devices, wireless lighting controls and wireless communication systems. Every show we perform uses wireless in some way. A regular play might have 8 wireless communication devices, 2 assisted listening transmitters and several wireless lighting control units while a musical will use all those items and in addition make use of 20-25 wireless microphones. Without these devices, we would not be able to perform musicals, enhance the sound for our hearing-impaired audience members or safely have crew do the complex backstage work during the productions.

Our equipment uses VHF, low UHF and some high UHF. Our VHF is in the shared usage spectrum or on Channel 13. UHF is typically channels 28, 29, 30, 31, 38, 39 although sometimes this changes if we rent gear that cannot tune to that area. Our wireless microphones have the widest range, allowing tuning between 548.100-697.900 MHz. All of this equipment is analog as up until very recently digital was either too expensive or introduced too much latency to be useful to us.

The majority of the equipment we use is owned by us and we expect most of the equipment to be in service for a decade. The move out of the 700MHz band required us to purchase all new equipment well before the equipment needed to be replaced at a cost of over \$50,000. However, we were fortunate at that time to have received unique pricing on the replacement equipment. Replacing our equipment today at market prices will cost in excess of \$100,000.

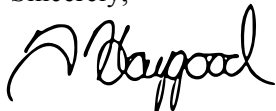
To manage all of this equipment, we have an audio/video supervisor on staff. He has a BA in Theatre Design and has been working in professional audio for over 15 years. This has required him to work with and manage wireless microphones, communication systems and other devices on a daily basis throughout his career.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

I appreciate that the Commission has been open and interested in Public Comment on this issue. Our organization along with performing arts organizations across the country provide demonstrable benefits to their communities by educating, enlightening and entertaining their communities. In addition, they provide economic benefits as well, both through spending in local economies and employment. Many of these organizations bore a heavy financial burden when it was required that the 700 MHz band be vacated. By expanding Part 74 LPAS rules, it will both benefit the arts community by providing protected frequencies for use and serve to ensure that future investments in equipment will work reliably and properly. Please accept my endorsement of the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Haygood", written in a cursive style.

Tom Haygood
Director of Production
Shakespeare Theatre Company